

**From:** Michael Bloch

**Sent:** Friday, September 3, 2021 1:47 PM

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**Subject:** Sines v. Kessler, Case No. 17 Civ. 72

Dear Judge Hoppe:

Following up on our August 20th confidential status conference, Plaintiffs have conferred with counsel for Discord who has agreed to de-designate the entirety of its document productions as Confidential under the operative protective order. As discussed, Discord's productions were previously marked Highly Confidential (effectively Attorneys' Eyes Only), which prevented Plaintiffs from producing the Discord productions to *pro se* Defendants. This de-designation enables Plaintiffs to now produce Discord's documents to the *pro se* Defendants, which we are in the process of doing. We have additionally requested that Discord consider removing entirely all confidentiality designations in advance of trial to streamline the presentation of that evidence, and we are informed that Discord is actively considering that request.

Additionally, Plaintiffs are currently in the process of de-designating certain documents currently marked Highly Confidential that Plaintiffs intend to use at trial, so that they may be

produced to *pro se* Defendants in advance of trial. Plaintiffs further note that a substantial number of documents produced by Defendants have been marked Confidential or Highly Confidential under the protective order. Plaintiffs are in the process of meeting and conferring with Defendants regarding those designations in an effort to resolve any designation issues without Court involvement so that they can be used at trial.

Respectfully submitted,

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